

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	CRIMINAL NO. 1:19-cr-43 (BAH)
MONICA ELFRIEDE WITT,	:	
also known as “Fatemah Zahra,”	:	
also known as “Narges WITT,”	:	
	:	
MOJTABA MASOUMPOUR,	:	<u>UNDER SEAL</u>
	:	
BEHZAD MESRI,	:	
	:	
HOSSEIN PARVAR, and	:	
	:	
MOHAMAD PARYAR,	:	
	:	
Defendants.	:	

MOTION TO UNSEAL INDICTMENT

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully moves this Court to unseal the Indictment in this case, effective at 10:00 a.m. on February 13, 2019. In support of this motion, the government states:

1. On February 8, 2019, a grand jury returned an indictment charging MONICA ELFRIEDE WITT with conspiracy to deliver national defense information to representatives of a foreign government, in violation of 18 U.S.C. § 794(c), and two counts of delivering national defense information to representatives of a foreign government, in violation of 18 U.S.C. § 794(a). The Indictment also charges HOSSEIN PARVAR, MOJTABA MASOUMPOUR, MOHAMAD PARYAR, and BEHZAD MESRI, with conspiracy, in violation of 18 U.S.C. § 371, two counts of attempt to commit a computer intrusion, in violation of 18 U.S.C. § 1030, and one count of aggravated identity theft, in violation of 18 U.S.C. § 1028A.

2. On the same day, the Honorable Magistrate Judge G. Michael Harvey granted the Government's motion for temporary sealing of the Indictment and related documents and to delay entry of the documents on the public docket.

3. Consistent with the arguments presented in its motion for temporary sealing of the Indictment, the Government now requests that the Court unseal the Indictment so that it may be disclosed publically. The Government requests that the unsealing occur at 10:00 a.m. on February 13, 2019, by operation of the Court's order.¹

WHEREFORE, the United States respectfully requests that this Court grant this motion and enter the attached proposed order.

Respectfully submitted,

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/s/
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¹ Because these proceedings are under seal, the Government is filing this motion under seal. The Government is not requesting that this motion, its proposed order, or any resulting Court order remain under seal if the relief sought here is granted. Nor is the Government requesting that the fact that bench warrants have issued for the defendants remain under seal. The Government does request that its motion to seal, filed and granted on February 8, 2019, remain under seal until a defendant is brought before the Court, at which time the Government would address whether the motion to seal should remain sealed.

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HOSSEIN PARVAR, and	:	
	:	
MOHAMAD PARYAR,	:	
	:	
Defendants.	:	

ORDER TO UNSEAL

Upon consideration of the Government’s Motion to Unseal Indictment, and for good cause shown, the Government’s motion is GRANTED and it is hereby

ORDERED that that, as of 10:00 a.m. on February 13, 2019, the Indictment in this matter is no longer under seal and may be disclosed publicly by the Government, and it is further

ORDERED that, as of 10:00 a.m. on February 13, 2019, these proceedings are unsealed in their entirety, except that the Government’s motion for temporary sealing, filed and granted on February 8, 2019, and the bench warrants for the defendants, issued on the same day, remain under seal but may be publically docketed.

SO ORDERED.

The Honorable Beryl A. Howell
Chief Judge